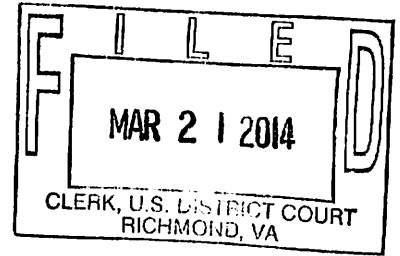


UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



GREGORY THOMAS BERRY, et al.,
Plaintiffs,
v.
LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC., et al.,
Defendants

11-cv-00754

**MOTION OF VICKI PIONTEK FOR LEAVE TO FILE OBJECTION
TO PROPOSED RULE 23(B)(2) CLASS ACTION SETTLEMENT**

And Now comes Vicki Piontek, pro se, and files this Motion for Leave to file Objection to Proposed Rule 23(B)(2) Class, and in support thereof states as follows.

1. In July of 2013 I decided to opt out of the FRCP 23(B)(3) class within the opt out deadline. See attached letter and certified mail card.
2. LexisNexis (a brand name used to describe all defendants in this litigation) has engaged in an active cover up to deny that it is a CRA, while at the same time CURRENTLY marketing Accurant reports for employment screening and consumer debt collection. Lexis Nexis has not modified their practices since the Berry settlement. Their actions are a clear misrepresentation in an effort to gain a tactical advantage and to re-define the definition of a CRA. See Objection to the Rule 23(B)(2) class which I have filed incorporated by reference.
3. Because of the active cover-up and misrepresentation made by LexisNexis, there is good cause for further investigation into the matter. The Court should consider new evidence including but not limited to emails from LexisNexis sale representatives and LexisNexis advertising materials. This evidence may not have been considered in the previous hearings.
4. The Court should also consider the fact that in July, 2013, I did file an opt out letter which was an attempt to object, and therefore this objection should relate back to that date.

Wherefore, I request leave from this Honorable Court to file this objection.

Vicki Piontek

3/20/2014
Date

Vicki Piontek (pro se)
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vicki.piontek@gmail.com

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GREGORY THOMAS BERRY, et al.,	:	
Plaintiffs,	:	
v.	:	
LEXISNEXIS RISK & INFORMATION	:	11-cv-00754
ANALYTICS GROUP, INC., et al.,	:	
Defendants	:	

CERTIFICATE OF SERVICE

I served a true and correct copy of the attached MOTION OF VICKI PIONTEK FOR LEAVE TO FILE OBJECTION TO PROPOSED RULE 23(B)(2) CLASS ACTION SETTLEMENT on the parties listed on the attached service. Service was by First Class U.S. mail, postage pre-paid.

Vicki Piontek

Vicki Piontek

Pro Se

951 Allentown Road

Lansdale, PA 19446

215-290-6444

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3/20/2014

Date of Service

SERVICE LIST

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